



November 23, 2022

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street Suite 600
San Francisco, CA 94105
Attn: Title V Reports

TV Tracking #: 605

1. RECEIVED IN ENFORCEMENT: 11/23/2022

SUBJECT: Title V Semi-Annual Monitoring Report #2
Reporting Period: May 1, 2022 to October 31, 2022
Shell Catalysts & Technologies
Bay Point, CA - Facility #A0227

Director of Compliance & Enforcement,

In accordance with Bay Area Air Quality Management District (BAAQMD) Regulation 2, Rule 6, Section 502, enclosed is the Title V Semi-Annual Monitoring Report for the monitoring period of May 1, 2022 to October 31, 2022 for Shell Catalysts & Technologies (Shell Catalysts).

Report Summary

During this reporting period (May 1, 2022 to October 31, 2022), there was one permit condition deviation. There was also a second deviation filed in this reporting period for invalid source tests, but the actual events occurred in 2020 and not in this reporting period. Short summaries of the events and investigations are listed below.

RCA# 08J75 – Episode Description – H2 Low Temperature – June 29, 2022

On June 29, 2022, the temperature of the H2 afterburner (A-56) dropped below the permitted temperature of 1450°F for approximately 33 minutes (Condition #9315 Part 9). The episode did not meet the definition of the “Allowable Temperature Excursion” in Condition #9315, Part 9.2 and resulted in a deviation from the Title V Permit Condition #9315, Part 9.

We believe this incident was the result of a recent annual preventative maintenance service by Messer Group – Industrial Gas (owner of the Oxygen tank). The investigation found they inadvertently closed a valve during the maintenance work but did not reopen it when the tank was returned to service. The tank and associated system are owned and operated by the Messer, and Shell does not maintain or operate any equipment upstream of the shutoff valve.

The investigation found the “Pressure Build Circuit” (PBC) was not operating. This was caused by the inadvertently closed upstream control valve, and therefore did not allow the tank to build the required internal pressure. With the valve closed and low supply pressure to the afterburner, this triggered the emergency closure of the main oxygen supply valve at the tank. This emergency shutdown logic is in place to prevent a leak downstream of the tank itself. This closure ultimately shut off the burner and led to the non-compliant temperatures.

We were issued an NOV by the District on August 22, 2022 for this event.



Invalid Source Tests –X1, X2, H2 Nuisance Baghouses (A3, A42, A55)- August 2020
X1/A3 Sources – S3, 4, 5, 6, 8, 9, 10
X2/A42 Sources – S408, 409, 410, 412, 414, 415, 415, 417, 418
H2/A55 Sources – S509, 511, 512, 513, 517, 518, 519, 520
(Reported September 2022)

On September 21, 2022, we were informed by our District Inspector, the District Source Test Group had recently reviewed our 2020 Particulate Matter Source Tests from August 2020 of the above-mentioned baghouses. They noted six technical and lab-based deficiencies with the protocols of the source tests by our contractor and deemed them invalid. This resulted in probable deviations from the Title V Permit Condition 16736 Parts 2 and Part 4.

At the time the 2020 Source Test Reports were submitted (September 2020), it demonstrated the three baghouses were in compliance with Part 2 and below the 0.003 grain loading limit. We believed they were compliant with the permit conditions and therefore were not reported in the 2020 reporting period.

The District Source Test group had also reviewed our 2021 Source Test report on these same baghouses at the same time. They were deemed properly completed and compliant, so it appears as if this was a one-time event.

We were issued an NOV by the District on September 26, 2022 for these events.

This episode is not listed in the following table for Condition 16736, for the above listed sources, as non-compliance since it occurred outside the monitoring period.

Certification of Compliance Monitoring

I certify under penalty of law this document and all attachments were prepared under my direction or supervision, in accordance with a system designed to assure qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding these matters, please contact Jeff Luengo at (925) 313-9862.

Thank You,

Richard Mincey
Plant Manager
Shell Catalysts & Technologies

The following tables list the compliance status for each source. An “X” in the Yes column means that unit is in compliance. An asterisk placed by “X*” or an “I*” (intermittent) indicates that there was an episode report and a break of the permit conditions during the time frame of the report.

Table VII – A									
Applicable Limits and Compliance Monitoring Requirements									
S1 – X1 MULLER, S12 – BULK BAG UNLOADER STATION, S13 – BBU CONVEYOR FEEDER, S14 – BBU DRAG CONVEYOR, S15 – BBU MULLER FEEDER SURGE BIN, S16 – BBU MULLER FEEDER; ABATED BY: A4 – X1 MULLER FILTER RECEIVER									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD condition #8444, part 1	Y		Ringelmann 0.5	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD 6-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
FP	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		N	None	X	
FP	BAAQMD condition #8444, part 2	Y		0.006 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #8444, part 2	Y		1,116 scfm	None	N	None	X	

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S2 - X1 DRYER, ABATED BY A6 – X1 DRYER BAGHOUSE
S407 – X2 DRYER, ABATED BY A57 – X2 DRYER BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD condition #13099, part 1	Y		Ringelmann 0.5	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr		N	NONE	X	
FP	BAAQMD condition #13099, part 3	Y		0.006 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13099, part 3	Y		8,000 scfm	NONE	N	NONE	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hrs	NONE	N	NONE	X	
SO2	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
SO2	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S3 - X1 DRIED PRODUCT ELEVATOR
S4 – X1 DRIED PRODUCT SCREENER
S5 – X1 LONG BREAKER
S6 – X1 KILN FEED CONVEYOR SYSTEM
S8 – X1 CALCINED PRODUCT ELEVATOR
S9 – X1 CALCINED PRODUCT SCREENER
S10 – X1 CALCINED PRODUCT PACKAGING
ABATED BY A3 – X1 NUISANCE DUST BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	BAAQMD Condition #16736, Part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
FP	BAAQMD 6-1-311	N		4.10 ^{P0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
FP	SIP 6-311	Y		4.10 ^{P0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 4	P/A	Source Test	X	
Through-put	BAAQMD condition #16736, part 1	Y		8,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition #16736, part 3a	Y		7% daily average, 6% monthly average, 6% 12-month average	BAAQMD condition #16736, part 8	P/D,M,A	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		9,372 acfm for A-3	None	N	None	X	

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S7 - X1 KILN; ABATED BY A2 – X1 KILN BAGHOUSE;
S413 – X2 KILN; ABATED BY A43 – X2 KILN BAGHOUSE;
BOTH ABATED BY A58 – X1/X2 KILN SCR

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	BAAQMD condition #13100, part 3	Y		0.006 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	BAAQMD Condition #13100, Part 3	Y		0.006 gr/dscf for A-2, A-43	BAAQMD Condition #13100, Part 7	N	Source test	X	
Air flow rate	BAAQMD condition #13100, part 3	Y		8,000 scfm combined for A-2 and A-43	NONE	N	NONE	X	
Throughput	BAAQMD Condition #16736, Part 1	Y		8,000 tons/yr for S-7	BAAQMD Condition #16736, Part 8	P/D	Recordkeeping	X	
Throughput	BAAQMD Condition #16736, Part 1	Y		9,000 tons/yr for S-413	BAAQMD Condition #16736, Part 8	P/D	Recordkeeping	X	
Nickel content	BAAQMD Condition #16736, Part 3a	Y		7% daily average, 6% monthly average, 6% 12-month average for S-7	BAAQMD Condition #16736, Part 8	P/D,M,A	Recordkeeping	X	
Nickel content	BAAQMD Condition #16736, Part 3b	Y		7% daily average, 6% monthly average, 6% 12-month average for S-413	BAAQMD Condition #16736, Part 8	P/D,M,A	Recordkeeping	X	
NOx	BAAQMD condition #13100, part 6	Y		58 lb/day or 21,000 lb/yr	BAAQMD condition #13100, part 8	C	CEM	X	
Natural gas	BAAQMD condition #13100, part 4	Y		700,000 therms at S7	BAAQMD condition #13100, part 9 & 10	C	Fuel meter, record keeping	X	

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S7 - X1 KILN; ABATED BY A2 – X1 KILN BAGHOUSE;
S413 – X2 KILN; ABATED BY A43 – X2 KILN BAGHOUSE;
BOTH ABATED BY A58 – X1/X2 KILN SCR

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
	BAAQMD condition #13100, part 5	Y		700,000 therms at S413	BAAQMD condition #13100, part 9 & 10	C	Fuel meter, record keeping	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	
	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	

Table VII - E
Applicable Limits and Compliance Monitoring Requirements
S11 - X1 CALCINED PRODUCT CONVEYOR
ABATED BY A3 – X1 NUISANCE DUST BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-301, Condition # 16736, part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	BAAQMD 6-1-301, Condition # 16736, part 5	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD Condition #16736, Part 2	Y		0.003 gr/dscf	BAAQMD Condition #16736, Part 4	P/A	Source test	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
Through-put	BAAQMD condition #16736, part 1	Y		8,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD Condition #16736, Part 7	Y		9,372 acfm for A-3	None	N	None	X	

Table VII - F
Applicable Limits and Compliance Monitoring Requirements
S19 – X1 RECYCLE STATION

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
Through-put	BAAQMD condition #16736, part 1	Y		3,667 tons/yr	BAAQMD condition #16736, part 6	P/D	Record keeping	X	

Table VII – G
Applicable Limits and Compliance Monitoring Requirements
S104 - H1 BLENDING TANK T-1
S105 – H1 BLENDING TANK T-2
S106 – H1 BLENDING TANK T-3
ABATED BY A49 – H1 BLENDING TANKS BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, Condition #9984, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, Condition #9984, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
	BAAQMD condition #9984, part 2	Y		0.006 gr/dscf	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #9984, part 2	Y		3,500 scfm	None	N	None	X	

Table VII - H
Applicable Limits and Compliance Monitoring Requirements
S303 – ALUMINA RECEIVING FLUIDSTAT STATION, ABATED BY A32 – ALUMINA RECEIVING DUST COLLECTOR;
AND BY A320 – ALUMINA RECEIVING STATION BLOWPOT DRY IN-LINE FILTER;
S309 – ALUMINA RECIRCULATION FLUIDSTAT STATION,
ABATED BY A38 – ALUMINA RECIRCULATION BLOWPOT BAGHOUSE;
AND BY A380 – ALUMINA RECIRCULATION STATION BLOWPOT DRY IN-LINE FILTER;
S310 – ALUMINA MEASURING FLUIDSTAT STATION,
ABATED BY A39 – ALUMINA MEASURING BLOWPOT BAGHOUSE;
AND BY A390 – ALUMINA MEASURING STATION BLOWPOT DRY IN-LINE FILTER

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	

Table VII - I
Applicable Limits and Compliance Monitoring Requirements
S304 – ALUMINA SILO 1, ABATED BY A33 – SILO 1 VENT FILTER;
S305 – ALUMINA SILO 2, ABATED BY A34 – SILO 2 VENT FILTER;
S306 – ALUMINA SILO 3, ABATED BY A35 – SILO 3 VENT FILTER;
S307 – ALUMINA SILO 4, ABATED BY A36 – SILO 4 VENT FILTER;
S308 – ALUMINA SILO 5, ABATED BY A37 – SILO 5 VENT FILTER

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	

Table VII - J
Applicable Limits and Compliance Monitoring Requirements
S311 - ALUMINA BULK BAG UNLOADER
S312 – ALUMINA REPACKAGING STATION
S313 – FINES GRINDER FEED HOPPER SYSTEM
S323 – FINES GRINDER FEED HOPPER SYSTEM (SECONDARY)
ABATED BY A40 – REPACKAGING BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #3344, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #3344, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #3344, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #3344, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #3344, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #3344, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #3344, part 6	Y		0.005 gr/dscf	BAAQMD condition. #3344, part 5	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #3344, part 7	Y		7% by weight per hour at S313 and S323	BAAQMD condition #3344, part 8	P/H	Record keeping	X	
Throughput (bulk)	BAAQMD condition #3344, part 2	Y		12,480 tons/yr for S311 and S312	BAAQMD condition #3344, part 8	P/D	Record keeping	X	
Throughput (catalyst)	BAAQMD condition #3344, part 3	Y		4,380 tons/yr for S313/323	BAAQMD condition #3344, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #3344, part 6	Y		2,900 scfm	NONE	N	NONE	X	

Table VII – K
Applicable Limits and Compliance Monitoring Requirements
S314 – REGROUND FINES STORAGE SILO TK-70112,
ABATED BY A44 – REGROUND FINES SILO DUST COLLECTOR;
S315 – REGROUND FINES STORAGE SILO TK-70113,
ABATED BY A45 – REGROUND FINES SILO DUST COLLECTOR;
S316 – REGROUND FINES STORAGE SILO TK-70114,
ABATED BY A46 – REGROUND FINES SILO DUST COLLECTOR;
S317 – REGROUND FINES STORAGE SILO TK-70115,
ABATED BY A47 – REGROUND FINES SILO DUST COLLECTOR;
S318 – FINES WEIGH HOPPER BLOW POT, ABATED BY A4, A40, A48, OR A601;
S319 – FINES BAGOUT STATION NO.1 & NO.2, ABATED BY A44 OR A47;
S320 – FINES GRINDER, ABATED BY A44, A45, A-46, OR A47;
S322 – FINES TANKER TRUCK DELIVERY SYSTEM, ABATED BY A44, A45, A-46, OR A47

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #8468, part 6	Y		0.005 gr/dscf	BAAQMD condition. #8468, part 5	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #8468, part 7	Y		7% by weight per hour	BAAQMD condition #3344, part 8	P/H	Record keeping	X	
Through-put (catalyst)	BAAQMD condition #8468, part 2	Y		4,380 tons/yr for each source	BAAQMD condition #8468, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #8468, part 6	Y		3,000 scfm from each source	NONE	N	NONE	X	

Table VII - L Applicable Limits and Compliance Monitoring Requirements S321 - ALUMINA STORAGE SILO; ABATED BY A50 – ALUMINA SILO 6 VENT FILTER									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13092, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13092, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13092, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13092, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13092, part 4	Y		0.005 gr/dscf	BAAQMD condition. #13092, part 3	C	Bag failure warning device	X	
Through-put (Alumina)	BAAQMD condition #13092, part 2	Y		9,636 tons/yr	BAAQMD condition #13092, part 5	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #13092, part 4	Y		150 scfm	NONE	N	NONE	X	

Table VII - M Applicable Limits and Compliance Monitoring Requirements S401 - X2 MULLER; ABATED BY A48 – X2 MULLER FILTER RECEIVER									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #8445, part 2	Y		0.006 gr/dscf	BAAQMD condition. #8445, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #8445, part 2	Y		1,116 scfm	NONE	N	NONE	X	

Table VII - N
Applicable Limits and Compliance Monitoring Requirements
S408 - X2 DRIED PRODUCT ELEVATOR
S409 – X2 DRIED PRODUCT SCREENER
S410 – X2 LONG BREAKER
S412 – X2 KILN FEED CONVEYOR
S414 – X2 CALCINED PRODUCT ELEVATOR
S415 – X2 CALCINED PRODUCT SCREENER
S416 – X2 CALCINED PRODUCT PACKAGING
S417 – X2 CALCINED PRODUCT CONVEYOR
S418 – X2 RECYCLE STATION
ABATED BY A42 – X2 NUISANCE DUST BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
	BAAQMD Condition #16736, Part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 4	P/A	Source Test	X	
FP	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
FP	SIP6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
Throughput	BAAQMD condition #16736, part 1	Y		9,000 tons/yr at each source	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition #16736, part 3b	Y		7% daily average, 6% monthly average, 6% 12-month average for S-7	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		8,600 scfm for A-42	None	N	None	X	

Table VII - O
Applicable Limits and Compliance Monitoring Requirements
S515 – H2 SOLID ADDITIVE HOPPER A,
ABATED BY A52 – H2 SOLID ADDITIVE HOPPER A FILTER RECEIVER;
S516 – H2 SOLID ADDITIVE HOPPER B,
ABATED BY A53 – H2 SOLID ADDITIVE HOPPER B FILTER RECEIVER;
S517 – H2 PRODUCT RECYCLE SYSTEM, S518 – H2 CALCINED FEED SYSTEM,
S519 – H2 SPHERICAL HOPPER SYSTEM, S520 – H2 CALCINED FEED BAGOUT STATION,
S517, S518, S519, AND S520 ABATED BY A55 – H2 NUISANCE BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #16736, part 5	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #16736, part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf for A-55 0.006 gr/dscf for A-52 & A-53	BAAQMD condition #16736, part 4	P/A	Source test	X	
Through-put	BAAQMD condition #16736, part 1	Y		S515: 1,700 tons/yr S516: 3,300 tons/yr S517: 12,000 tons/yr S518: 12,000 tons/yr S519: 12,000 tons/yr S520: 12,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition #16736, part 3c,d,e	Y		15% daily average, 15% monthly average, 7% 12-month average for S515 & S516; 8% daily average, 7% monthly average, 7% 12-month average for S517, S518, S519, S520	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		1,200 acfm for A52 & A53; 12,000 acfm for A55	None	N	None	X	

Table VII – P
Applicable Limits and Compliance Monitoring Requirements
S502 - NICKEL SOLUTION TANK

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Ni	BAAQMD Regulation 2-1, Table 2-1-316	Y		0.73 lb/yr	BAAQMD 2-1-316.1	P/Annual	Record keeping	X	

Table VII – Q
Applicable Limits and Compliance Monitoring Requirements
S504 - H2 BLENDING TANK T-1
S505 – H2 BLENDING TANK T-2
S506 – H2 BLENDING TANK T-3
S507 – H2 LIQUID/SOLID BLENDER
S510 – H2 KILN
ABATED BY A54 – H2 KILN BAGHOUSE AND BY A56 – H2 AFTERBURNER

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #9315, part 4	Y		0.006 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #9315, part 4	Y		7,500 scfm	NONE	N	NONE	X	
NOx	BAAQMD condition #9315, part 10	Y		120 lb/day	BAAQMD condition #9315, part 13 & 14	P/A and D	Source test (A), Record keeping (D)	X	
NH3	BAAQMD condition #9315, part 10	Y		2,200 lb/day, and 200 lb/day (when A-56 in operation)	BAAQMD condition #9315, part 13	P/A and D	Source test (A), Record keeping (D)	X	
CO	BAAQMD condition #9315, part 8	Y		400 ppmv dry @ 3% Oxygen	BAAQMD condition #9315, part 13	P/A	Source test	X	
Temperature (A-56)	BAAQMD condition #9315, part 9.1 & 9.2	Y		≥1450 degree F, except as allowed by Condition # 9315 parts 9.1 & 9.2	BAAQMD condition #9315, part 7	C	Temperature Monitor	I*	
Residence time (A-56)	BAAQMD condition #9315, part 9	Y		0.4 second	BAAQMD condition #9315, part 13	P/A	Source test	X	
Nickel content	BAAQMD condition #9315, part 1	Y		10% 12-month average		P/D	Record keeping	X	

* **Intermittent - Note:** Condition #9315, Part 9 was violated for a period of 33 minutes during this reporting period. A deviation report was submitted to BAAQMD. See episode summary in cover letter above.

Table VII - R
Applicable Limits and Compliance Monitoring Requirements
S509 – H2 KILN FEED CONVEYOR
S511 – H2 PRODUCT CONVEYOR
S512 – H2 PRODUCT SCREENER
S513 – H2 PRODUCT PACKAGING
ABATED BY A55 – H2 NUISANCE BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
	BAAQMD condition 16736, part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition 16736, part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD condition 16736, part 2	Y		0.003 gr/dscf for A-55	BAAQMD condition #16736, part 4	P/A	Source Test	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
Throughput	BAAQMD condition 16736, part 1	Y		12,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition 16736, part 3e	Y		8% daily average, 7% monthly average, 7% 12-month average	BAAQMD condition #16736, part 8	P/D,M,A	Record keeping	X	
Air flow rate	BAAQMD condition 16736, part 7	Y		11,000 acfm for A-55	None	N	None	X	

Table VII – S
Applicable Limits and Compliance Monitoring Requirements
S600 - X3 DRIED EXTRUDER, SCREENER, CONVEYOR;
ABATED BY A607 – X3 DUST COLLECTOR,
FOLLOWED BY A603 – X3 DRYER BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13093, part 2	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	BAAQMD 6-301, condition #13093, part 2	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	None	N	None	X	
	BAAQMD condition #13093, part 3	Y		0.005 gr/dscf	BAAQMD condition #13097, part 4	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13093, part 3	Y		12,000 scfm	None	N	None	X	
Through-put	BAAQMD condition #13093, part 4	Y		36 tons/day	BAAQMD condition #13093, part 5	P/D	Record keeping	X	
Nickel & Nickel compounds content	BAAQMD condition #13093, part 1	Y		3.0% by weight averaged over any consecutive 12-month period	BAAQMD condition #13093, part 5	P/D	Record keeping	X	

Table VII - T
Applicable Limits and Compliance Monitoring Requirements
S601 - X3 FINES SURGE HOPPER;
ABATED BY A601 – X3 FINES SURGE HOPPER BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13094, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #13094, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13094, part 4	Y		0.006 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13094, part 4	Y		100 scfm	NONE	N	NONE	X	
Through-put (catalyst)	BAAQMD condition #13094, part 2	Y		1,400 tons/yr	BAAQMD condition #13094, part 5	P/D	Record keeping	X	

Table VII - U
Applicable Limits and Compliance Monitoring Requirements
S602 - X3 ALUMINA SURGE HOPPER;
ABATED BY A602 - X3 ALUMINA SURGE HOPPER BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13095, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #13095, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13095, part 4	Y		0.006 gr/dscf	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13095, part 4	Y		200 scfm	BAAQMD condition #13095, part 4	N	NONE	X	
Through-put (Alumina)	BAAQMD condition #13095, part 2	Y		9,636 tons/yr	BAAQMD condition #13095, part 5	P/D	Record keeping	X	

**Table VII - V
Applicable Limits and Compliance Monitoring Requirements
S603 - X3 EXTRUDER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13096, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301, condition #13096, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
Through-put	BAAQMD condition #13096, part 2	Y		31,665 tons/yr	BAAQMD condition #13096, part 3	P/D	Record keeping	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per year	BAAQMD condition #15672, part 14	P/M	Record keeping	X	

Table VII - W
Applicable Limits and Compliance Monitoring Requirements
S604 - X3 DRYER; ABATED BY A603 X3 DRYER BAGHOUSE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13097, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
Opacity	SIP 6-301, condition #13097, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13097, part 5	Y		0.005 gr/dscf	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per consecutive 12-month averaging period	BAAQMD condition #15672, part 14	P/M	Record keeping	X	
Air flow rate	BAAQMD condition #13097, part 4	Y		12,000 scfm	NONE	N	NONE	X	
Natural gas	BAAQMD condition #13097, part 6	Y		534,360 therms/yr	BAAQMD condition #13097, part 7 and 8	C/M	Fuel meter and Record keeping	X	

Table VII - X
Applicable Limits and Compliance Monitoring Requirements
S606 - X3 CALCINER, ABATED BY A604 X3 CALCINER BAGHOUSE,
A605 – X3 CALCINER SCR, AND A606 – X3 CALCINER CO CATALYST

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #15672, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #15672, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #15672, part 3	Y		0.005 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
NOx	BAAQMD condition #15672, part 6	Y		51 lb/day or 18,500 lb/yr	BAAQMD condition #15672, part 12	C	CEM	X	
CO	BAAQMD condition #15672, part 9	Y		19,524 lb/yr	BAAQMD condition #15672, part 12	C	CEM	X	
	BAAQMD condition #15672, part 8	Y		40 ppmv	BAAQMD condition #15672, part 12	C	CEM	X	
CO abatement efficiency	BAAQMD condition #15672, part 8	Y		90% mass basis	BAAQMD condition #15672, part 12	C	CEM	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per consecutive 12-month period	BAAQMD condition #15672, part 14	P/M	Record keeping	X	
Air flow rate	BAAQMD condition #15672, part 3	Y		1,736 scfm	NONE	N	NONE	X	
Natural gas	BAAQMD condition #15672, part 4	Y		700,000 therms	BAAQMD condition #15672, part 13 & 14	P/C/M	Fuel meter, Record keeping	X	

Table VII – Y
Applicable Limits and Compliance Monitoring Requirements
S612 – EMERGENCY STANDBY DIESEL FIRE PUMP ENGINE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
SO2	BAAQMD 9-1-301 BAAQMD	Y		GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours	None	P/E	Fuel certification by vendor	X	
	BAAQMD 9-1-304	Y		Sulfur content of fuel <0.5% by weight	None	P/E	Fuel certification by vendor	X	
Opacity	BAAQMD Regulation 6-1-303	N		≥ Ringelmann 2 for ≤ 3 min/hr		N		X	
Opacity	SIP Regulation 6-303	Y		≥ Ringelmann 2 for ≤ 3 min/hr		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 grain/dscf		N		X	
Hours of operation	BAAQMD 9-8-330.1	N		Emergency use for an unlimited number of hours	BAAQMD 9-8-530	C P/E	Hour meter, recordkeeping	X	
	SIP Regulation 9-8-330.1	Y		Emergency use for an unlimited number of hours	SIP Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	
	40 CFR 63.6640 (f)(1)(i)	Y		Emergency use for an unlimited number of hours	40 CFR 63.6655	C P/E	Hour meter, recordkeeping	X	
Hours of operation	BAAQMD 9-8-330.2	N		Reliability-related activities not to exceed 100 hours in any consecutive 12-month period	BAAQMD 9-8-530	C P/E	Hour meter, recordkeeping	X	
	SIP Regulation 9-8-330.2	Y		Reliability-related activities not to exceed 100 hours in any consecutive 12-month period	SIP Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	
	40 CFR 63.6640 (f)(1)(ii)	Y		Reliability-related activities not to exceed 100 hours in any consecutive 12-month period	40 CFR 63.6655	C P/E	Hour meter, recordkeeping	X	
Hours of Operation	BAAQMD Regulation 9-8-330.3	N		<50 hours each per calendar year	BAAQMD Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	

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				for reliability testing					
	SIP Regulation 9-8-330.3	Y		<50 hours each per calendar year for reliability testing	SIP Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	
	40 CFR 63.6640 (f)(1)(iii)	Y		<50 hours each per calendar year for reliability testing	40 CFR 63.6655	C P/E	Hour meter, recordkeeping	X	
Hours of Operation	BAAQMD Condition #22851 Part 1	Y		<= 34 hours/year for reliability-related activities	BAAQMD Condition#22851, Parts 3 and 4	C P/E	Hour meter, recordkeeping	X	
	BAAQMD Condition #22851 Part 2	Y		Emergency use for an unlimited number of hours	BAAQMD Condition #22851 Parts 3 and 4	C P/E	Hour meter, recordkeeping	X	
Oil and filter change	40 CFR 63.6603(a)	Y		Every 500 hours of operation or annually, whichever comes first.	40 CFR 63.6655(e)(3)	P/E	Recordkeeping	X	
Air cleaner inspection	40 CFR 63.6603 (a)	Y		Every 1000 hours of operation or annually, whichever comes first.	40 CFR 63.6655(e)(3)	P/E	Recordkeeping	X	
Hoses and belts inspection and replace as necessary	40 CFR 63.6603(a)	Y		Every 500 hours of operation or annually, whichever comes first.	40 CFR 63.6655(e)(3)	P/E	Recordkeeping	X	